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*Attorneys for Defendant Vidocq Society*

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an individual and as guardian *ad litem*, on behalf of S.M., a minor,

Civil Case No. 6:20-CV-01163-MTK  
(Lead Case)

**Plaintiffs,**

V.

MARK DANNELS, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE,  
SEAN SANBORN, ERIC  
SCHWENNINGER, RICHARD WALTER,  
CHRIS WEBLEY, ANTHONY WETMORE,  
KATHY WILCOX, CRAIG ZANNI, DAVID  
ZAVALA, JOEL D. SHAPIRO AS  
ADMINISTRATOR OF THE ESTATE OF  
DAVID E. HALL, VIDOCQ SOCIETY,  
CITY OF COQUILLE, CITY OF COOS  
BAY, and COOS COUNTY.

### Defendants.

DECLARATION OF MEREDITH A.  
SAWYER IN SUPPORT OF  
DEFENDANT VIDOCQ SOCIETY'S  
OPPOSITION TO PLAINTIFFS'  
MOTION FOR LEAVE TO FILE A  
COMBINED RESPONSE TO  
DEFENDANTS' MOTIONS FOR  
SUMMARY JUDGMENT

DECL. OF M. SAWYER ISO DEF. VIDOCQ SOCIETY'S OPP. TO  
PLTFs MOTION FOR LEAVE TO FILE A COMBINED RESPONSE  
TO DEFS' MOTIONS SJ - Page 1

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1 VIDOCQ SOCIETY,

2 v.  
3 Cross-Claimant.

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9 MARK DANNELS, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE,  
SEAN SANBORN, ERIC  
SCHWENNINGER, RICHARD WALTER,  
CHRIS WEBLEY, ANTHONY WETMORE,  
KATHY WILCOX, CRAIG ZANNI, DAVID  
ZAVALA, JOEL D. SHAPIRO AS  
ADMINISTRATOR OF THE ESTATE OF  
DAVID E. HALL, CITY OF COQUILLE,  
CITY OF COOS BAY, and COOS COUNTY.

10 Cross Defendants

11 NICHOLAS JAMES MCGUFFIN, as an  
12 individual and as guardian *ad litem*, on behalf  
of S.M., a minor,

13 Plaintiffs,

14 v.

15 OREGON STATE POLICE,

16 Defendant.

Civil Case No. 3:21-cv-01719-MTK  
(Trailing Case)

17 I, Meredith A. Sawyer, am over the age of eighteen years of age, am competent to testify  
18 and have personal knowledge of the facts contained herein.

- 19 1. I am counsel of record for Defendant Vidocq Society.
- 20 2. Plaintiffs' counsel sent an email to all defense counsel on January 28, 2025, stating  
21 their intention to file a motion seeking leave to file a combined response to the  
22 defendants' individual motions for summary judgment and asked defense counsel to  
23 advise if there was any objection. On January 30, 2025, I responded by email,  
24 expressing my objection to a combined response brief. Counsel for Walter and the

1 Municipal defendants also communicated to plaintiffs' counsel their opposition to a  
2 combined response brief.

- 3 3. At no point did Plaintiffs' counsel contact me or my office by telephone to confer  
4 regarding their planned motion nor did I have any missed calls from Plaintiffs' counsel.

5 **I declare under penalty of perjury under the laws of the United States that the  
6 foregoing is true and correct to the best of my knowledge, information, and belief.**

7 EXECUTED this 4<sup>th</sup> day of February, 2025 in Seattle, Washington.  
8

9  
10 /s/ Meredith A. Sawyer  
11 Meredith A. Sawyer, *pro hac vice*  
msawyer@hwslawgroup.com